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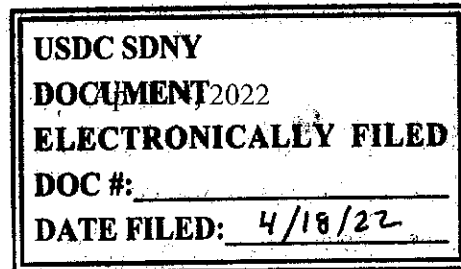
Phone: (412) 932-2814

Email: roy.arnold@blankrome.com

MEMO ENDORSED

VIA ECF

The Honorable Lewis A. Kaplan
United States District Judge
for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007



Re: *Waite v. UMG Recordings, Inc.*,
Civil Action No. 1:19-cv-01091-LAK (S.D.N.Y.)

Dear Judge Kaplan:

On behalf of Plaintiffs Kasim Sulton, Susan Straw Harris p/k/a Syd Straw, Leonard Graves Phillips, Stan Sobol p/k/a Stan Lee, Steve Wynn, Dennis Mehaffey p/k/a Dennis Duck, and Joel David Pellish p/k/a Dave Provost, on behalf of themselves and all others similarly situated (collectively, "Plaintiffs"), we write pursuant to the S.D.N.Y. Electronic Case Filing Rules & Instructions and Your Honor's Individual Rules to respectfully request an Order authorizing Plaintiffs to file Exhibit 23 to Plaintiffs' Motion for Class Certification and Exhibit 30 to Plaintiffs' Motion for Partial Summary Judgment under seal.

Plaintiffs request that these exhibits be filed under seal because material in these documents is marked confidential pursuant to the Stipulated Confidentiality Agreement and Protective Order. *See* Dkt. 64. Pursuant to Your Honor's Individual Rules, Plaintiffs met and conferred with Defendants on April 13, 2022, to reach an agreement concerning exhibits that ought to be filed under seal. Defendants request these exhibits be filed under seal because they contain excerpted language from recording agreements that Defendants have been marked "Confidential." Defendants consent to, and do not oppose, this motion to seal.

Sincerely,

/s/ Roy W. Arnold

Roy W. Arnold

cc: Counsel of Record

Counsel for Plaintiffs
Gracett
SO ORDERED
Lewis A. Kaplan
LEWIS A. KAPLAN, USDJ
4/18/22